

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

HANS MOKE NIEMANN,

Plaintiff,

v.

SVEN MAGNUS ØEN CARLSEN A/K/A  
MAGNUS CARLSEN, PLAY MAGNUS AS  
D/B/A PLAY MAGNUS GROUP, CHESS.COM,  
LLC, DANIEL RENSCH A/K/A “DANNY”  
RENSCH, AND HIKARU NAKAMURA,

Defendants.

Case No. 4:22-cv-01110-AGF

Hon. Audrey G. Fleissig

**DEFENDANT DANIEL “DANNY” RENSCH’S  
MOTION TO DISMISS PLAINTIFF’S SECOND AMENDED COMPLAINT**

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*Counsel for Defendant Daniel “Danny” Rensch*

COMES NOW Defendant Daniel “Danny” Rensch, by and through his undersigned attorneys, and moves this Court pursuant to Federal Rule of Civil Procedure 12(b)(2) and (6) and Connecticut’s anti-Strategic Lawsuits Against Public Participation (“anti-SLAPP”) statute, Conn. Gen. Stat. § 52-196a, to dismiss the Second Amended Complaint (“SAC”) (ECF No. 75) of Plaintiff Hans Niemann for lack of personal jurisdiction and failure to state a claim upon which relief may be granted. As more fully set forth in the accompanying Memorandum of Law in Support:

1. The SAC fails to allege facts sufficient to establish this Court’s general or specific personal jurisdiction over Rensch under the Due Process Clause of the U.S. Constitution and the Missouri long-arm statute. Therefore, the Court should dismiss Rensch for lack of personal jurisdiction.

2. The SAC also fails to state a claim against Rensch as a matter of law for the reasons discussed in Defendants Chess.com, LLC’s and Magnus Carlsen’s concurrently filed motions to dismiss and accompanying memoranda of law in support, which arguments Rensch joins in and incorporates by reference herein. Therefore, the Court should dismiss the SAC’s Counts I, II, III, IV, V, and VI against Rensch for failure to state a claim.

**Wherefore**, Rensch respectfully requests that this Court grant this motion and dismiss the claims against him (Counts I through VI) and grant any further and necessary relief, including attorneys’ fees and costs as may be allowed by law. The motion is based upon this motion, the accompanying Memorandum of Law in Support of the motion, Chess.com, LLC’s and Magnus Carlsen’s motions to dismiss and accompanying memoranda of law in which Rensch joins and incorporates by reference herein, and all pleadings in this action, as well as other writing and oral argument the Court may entertain.

DATED: January 24, 2023

Respectfully submitted,

/s/ Nima H. Mohebbi

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 24, 2023, the foregoing document was served on all counsel of record by ECF.

DATED: January 24, 2023

/s/ Nima H. Mohebbi

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